

Hammerschmidt, Ron

From: Gravatt, Dan
Sent: Tuesday, February 18, 2014 7:13 AM
To: Tapia, Cecilia; Field, Jeff
Cc: Hammerschmidt, Ron
Subject: RE: Response to KWMU, RE: Possible SSE Impacts Report

Cecilia, here are the PRP's executive summary bullets from their SSE evaluation:

- The radiologically-impacted material (RIM) disposed of in West Lake Areas 1 and 2 will not become more or less radioactive in the presence of heat. Likewise, the RIM is not explosive and will not become explosive in the presence of heat.
- An SSE does not create conditions that could carry RIM particles or dust off the site. The heat of an SSE is not high enough to ignite non-RIM wastes or chemical compounds or to cause them to explode.
- An SSE may allow radon gas to more easily rise through the ground and reach the surface of the landfill than would otherwise occur, because heat will reduce the amount of moisture in the buried solid waste (trash) thereby increasing the amount of air between the soil particles and thus limiting the ability of the buried solid waste to retain radon below ground. Any radon gas that does make it to the surface would dissipate quickly in open air. This potential increase in the rate of release of radon gas at the surface of the landfill would be limited to the area of the SSE and would stop when the SSE ends.
- An SSE in West Lake Area 1 or 2 would create no long-term additional risks to people or the environment.
- Any short-term risks would be associated with the temporary increase in radon gas coming from the surface of the landfill if no cap is installed on the landfill, or if the cap called for by the 2008 ROD was not properly maintained.
- These short-term risks can be addressed by designing, building, and maintaining the landfill cap called for by the 2008 ROD, and by maintaining the land use restrictions already in place on the entire West Lake property, which prevent certain site uses.
- There are no additional ARARs associated with an SSE.

ORD's observations and evaluation memo (labeled "Draft and Deliberative") for the PRP's SSE evaluation is structured to provide comments on each of the PRPs' summary bullets. In general, they state that there is more uncertainty in each of these bullet statements than the PRPs indicate, and that an SSE in OU-1 Area 1 would pose more risks than the PRPs' evaluation indicates. In several places ORD's observations attempt to draw parallels between the events at the Bridgeton Sanitary Landfill and potential future events at OU-1 Area 1 as a source of these risks; I am not convinced of the relevance of this comparison due to the substantially different histories and circumstances at the two cells (detailed in my e-mail to Jeff Field on February 14). ORD's comments hint at the possibility of conducting some types of studies to resolve some of these uncertainties, but I do not think these could be done quantitatively. ORD's memo does not provide an estimate of the likelihood of an SSE occurring in or traveling to the OU-1 cell, and does not provide a definitive approval or rejection of the PRP's SSE evaluation. It is not clear if ORD intends to update their memorandum to "Final" in the future.

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Principles and integrity are expensive, but they are among the very few things worth having.

From: Tapia, Cecilia
Sent: Monday, February 17, 2014 9:00 AM
To: Gravatt, Dan; Field, Jeff

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Superfund

Subject: Fw: Response to KWMU, RE: Possible SSE Impacts Report
Importance: High

Can you give me a brief summary.

From: Brooks, Karl
Sent: Saturday, February 15, 2014 11:29:41 AM
To: Hammerschmidt, Ron; Hague, Mark; Tapia, Cecilia
Subject: Fw: Response to KWMU, RE: Possible SSE Impacts Report

Tell Mark and me what PRP study and ORD analysis say after Sr Staff.

Tx

From: Thomas, Hattie
Sent: Friday, February 14, 2014 2:53:30 PM
To: Brooks, Karl; Hague, Mark
Subject: FW: Response to KWMU, RE: Possible SSE Impacts Report

Second of two, EPA's response. Thanks - HLT

From: Whitley, Christopher
Sent: Friday, February 14, 2014 3:48 PM
To: Thomas, Hattie; Hoefer, David; Hammerschmidt, Ron; Tapia, Cecilia; Peterson, Mary
Subject: Response to KWMU, RE: Possible SSE Impacts Report

After consultation with Cecilia and David, we will provide the following written comment to Veronique LaCapra at KWMU:

"EPA Region 7 has tasked the responsible parties with evaluating potential impacts of the subsurface smoldering event in Bridgeton Landfill, and a report of that evaluation was completed on January 14, 2014. EPA Region 7 forwarded the report to the EPA Office of Research and Development (ORD) for its expert review and comments, and those comments have just been received by the region. EPA Region 7 staff are currently reviewing the ORD comments and performing an evaluation of the report. That evaluation is not complete at this time."

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